

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

BEARBOX LLC and AUSTIN STORMS,

Plaintiffs,

v.

LANCIUM LLC, MICHAEL T.
MCNAMARA, and RAYMOND E. CLINE,
JR.

Defendants.

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C.A. No. 21-534-MN-CJB

EXPERT REPORT OF MARK EHSANI, Ph. D.

OUTSIDE COUNSEL'S EYES ONLY - SUBJECT TO PROTECTIVE ORDER

2. To summarize, it is my opinion that: (1) Mr. Storms should not be named as the sole inventor or a joint inventor of the '433 patent because it is well documented that Messrs. McNamara and Cline independently developed the inventions claimed in the '433 patent without the utilization of any information allegedly provided by Mr. Storms; (2) the communications from Mr. Storms to Mr. McNamara did not disclose the claim elements of the '433 patent and, at most, consisted of nothing more than general principles that were well-known to Mr. McNamara, Lancium, and others, at the time of Mr. Storms' communications; (3) Mr. Storms/BearBox were not in possession of the inventions of the '433 patent as of May 9, 2019—the date of the last communication between Mr. Storms and Mr. McNamara; and (4) Defendants have not and did not convert the alleged BearBox technology, and have not been unjustly enriched as a result of the alleged BearBox technology. The bases for these and my other opinions are provided below.

3. The opinions provided in this report and the bases for those opinions are as of the date of this report. Based on further review of the materials in this case, including the testimony and/or opinions of other expert witnesses or additional discovery that may be provided, I may offer revised and/or additional opinions.

4. My educational background, publications, and relevant experience and qualifications are summarized below, and in my curriculum vitae, which is attached as Exhibit A to this report.

II. BACKGROUND AND QUALIFICATIONS

5. For nearly 40 years, I have conducted research, and taught classes involving electrical power. My research and expertise includes, among other areas, power systems, power grid technologies, power electronics, renewable power systems, grid scale energy storage systems, dynamic loads, and their related technologies, such as variable value storage from the grid power generation.

6. I received my Bachelors and Masters degrees, in electrical engineering, from the University of Texas at Austin in 1973 and 1974, respectively. After a few years of professional work and research I received my Ph.D. in electrical engineering from University of Wisconsin-Madison, in 1981.

7. I founded one of the first university power electronics and grid scale energy storage teaching and research programs in the United States, which is considered in the top three in the U.S. and one of the best in the world. For this I received several awards and recognitions, such as the IEEE Outstanding Teaching Award in 2003, which is the top academic award in this field.

8. I have organized two undergraduate and five graduate courses in power and energy systems at Texas A&M University. Many of these courses include the topics of power transmission, controllable loads, their controls and applications for various systems such as energy and value storage. I have also conducted research and supervised over 90 Ph.D. and M.S. theses on these topics.

9. I have been a Distinguished Lecturer of IEEE Power and Energy Society and was one of the founders of the Institute of Electrical and Electronics Engineers, IEEE, Power Electronics Society in the early 1980's and served on its founding Administrative Council and chaired its committees for many years. This professional society is the main forum for power electronics, renewable energy system controls and energy storage specialists and organizes several annual conferences and has a journal for publication of state of the art papers in power electronics and motor drives. I have chaired many of these international conferences and have been a reviewer for the publications of these societies for over three decades.

10. I have also served in positions of leadership in power electronics, specialty power systems and their applications in other professional societies, including IEEE Industry Application

Society, IEEE Industrial Electronics Society, IEEE Vehicular Technology Society, and Society of Automotive Engineers (SAE). I have received numerous honors and awards from these societies for my contributions to energy and power systems technologies and their state of the art, such as the Avant Garde Award from IEEE Vehicular Technology Society, for contributions to the technology of electric vehicles and their charging from the power grid. I have been elected Life Fellow of both IEEE and Fellow of SAE, which is the highest ranking given to a fraction of one percent of the membership of these professional societies.

11. Over the past 35 years, I have been a consulting engineer in the areas of power and energy systems and their applications to over 60 companies in the U.S. and internationally. I have also given numerous energy and power systems short courses and seminars in the U.S. and all over the world for continuing education of power engineers in companies and government agencies.

12. I am the author or co-author of over 450 published papers, 21 books, and over 24 patents relating to power systems and applications. A list of my publications is included in my professional CV. Some samples of my work in the field, include:

- Chief Editor for Power Systems Series, CRC Press, 1989;
- Member of Editorial Board of Electric Machines and Power;
- Appointed as a Member of Committee on Next Generation Materials and Processes for Advanced Hybrid Power Systems, National Materials Advisory Board, National Research Council, National Academy of Engineering, September 2000;
- Advanced Mobile Integrated Power System (AMPS)", Short Course, January 2005, US Army Tank Automotive Command (TACOM), Warren, Michigan;
- Co-author, "Combat Hybrid Power Systems Technologies, Technical Challenges and Research Priorities," a report of National Research Council of the National Academies, 2003;
- M. Ehsani, M. O. Bilgic, A. D. Patton, and J. Mitra, "New Architectures for Space Power Systems," IEEE Aerospace and Electronics Systems Magazine, Vol. 10, No. 8, August 1995, pp. 3-8;

- A. Emadi, J. P. Johnson, and M. Ehsani, “Stability Analysis of Large DC Solid State Power Systems for Space,” IEEE Aerospace and Electronic Systems Magazine, Vol. 15, No. 2, February 2000, pp. 25-30;
- A. Emadi and M. Ehsani, “Aircraft Power Systems: Technology, State of the Art, and Future Trends,” IEEE Aerospace and Electronic Systems Magazine, Vol. 15, No. 1, January 2000, pp. 28-32;
- A. Emadi, B. Fahimi, and M. Ehsani, “On the Concept of Negative Impedance Instability in the More Electric Aircraft Power Systems with Constant Power Loads,” SAE Journal, paper No. 1999-01-2545, 1999;
- M. Ehsani and A. Emadi, “Multi-Converter Power Systems and Their Applications,” Journal of Electric Power Component and Systems, vol. 29, no. 10, pp. 949-963, October 2001;
- M. Falahi, K. Butler-Purpy, M. Ehsani, "Dynamic reactive power control of islanded microgrids," IEEE Transactions on Power Systems, Vol. 28, No. 4, November 2013, pp. 3649-3657;
- M. Falahi, K. Butler-Purpy, M. Ehsani, "reactive power coordination of shipboard power systems in presence of pulsed loads," IEEE Transactions on Power Systems, Vol. 28, No. 4, November 2013, pp. 3675-3682;
- H. M. K. Al-Masri, A. AbuElrub, A. A. Almeshizia, and M. Ehsani, "Multi-figure of merit optimization for global scale sustainable power systems," Renewable Energy, vol. 134, pp. 538-549, 2019;
- “New Architectures for Superconductive and Normal Power Systems,” US Interagency Advanced Power Group, Systems Working Group Meeting Report, April 1989;
- “Superconductive Power Systems,” Electric Power Research Institute (EPRI) Research Project Report, 1991; and
- Co-author, “Combat Hybrid Power Systems Technologies, Technical Challenges and Research Priorities,” a report of National Research Council of the National Academies, 2003.

13. Based on my education, professional experience of forty-two years, and scholarly books and publications, I am an expert in the areas of power systems, controlling electrical loads, including using computers to control electrical loads where such loads could include data centers, cryptocurrency miners, and/or other consumers of electrical power. I was an expert in these areas

since before January 11, 2018 (the priority date of Lancium Patent Application No. 62/616,348, the application upon which PCT WO 2019/139632 (“the ’632 application”) claims priority), May 3, 2019 (the date I understand that Mr. Storms first communicated with Mr. McNamara), and before October 28, 2019 (the date of Lancium’s Provisional Patent Application No. 62/927,119, upon which the ’433 patent claims priority). As such, I am intimately familiar with how a person of ordinary skill in the art on these dates would have understood the technology discussed and claimed in the ’632 application, the ’433 patent, and the technology that Mr. Storms maintains he developed and disclosed to Mr. McNamara between May 3, 2019 and May 9, 2019.

III. COMPENSATION AND PRIOR TESTIMONY

14. I am being compensated at a rate of \$500 per hour (my standard rate) for the time spent on this case. In addition, I am being reimbursed for my reasonable expenses incurred in connection with my work on this case. My compensation is independent of the content of my opinions and does not depend upon the outcome of this litigation or the results of my analysis. To my knowledge, I have no financial interest in any of the parties.

15. To the best of my recollection, in the past four years I have provided expert testimony, either by deposition or trial, in the matters listed below:

- *Fortis Advisors, LLC* v. Dematric Corp., No. N18C-12-104 (deposition and court testimony);
- Flywheel Sports v. *Peloton Interactive, Inc.*, IPR2019-00294 (deposition);
- *Halliburton Energy Services, Inc.* v. Jianying “Jerry” Chu, No. 2019-27459 (Dist. of Harris Co., 127th Dist.) (deposition).

The italicized names are the parties on whose behalf I was retained. In addition, I include the following cases in an abundance of caution as I may (or may not) have provided deposition

V. SUMMARY OF OPINIONS

17. It is my opinion that (i) Messrs. McNamara and Cline independently conceived and developed the inventions claimed in the '433 patent without the utilization of any information allegedly provided by Mr. Storms; and (ii) Mr. Storms has not demonstrated that he, solely or otherwise, conceived each and every element of each and every claim of the '433 patent. In my opinion, therefore, Mr. Storms should not be the sole inventor of the '433 patent

■ [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

■ [REDACTED]

[REDACTED]

[REDACTED]

² I use the term “alleged” because, based on my understanding of BearBox’s/Storms’ “technology,” it does not have the capabilities that Plaintiffs’ and Dr. McClellan ascribe to it.

[REDACTED]

20. The detailed bases for these (and other) opinions are set forth in the paragraphs below.

VI. LEGAL PRINCIPLES

21. I do not offer opinions on the relevant law in this report because I am not a lawyer. However, I have been advised by counsel regarding the relevant legal standards that apply to the issues that I have been asked to investigate, and I applied those standards in forming my opinions and drawing my conclusions regarding those issues.

22. I offer opinions on several issues, including whether: (i) Mr. Storms should have been named an inventor on the '433 patent, (ii) Mr. Storms/Bearbox communicated information to Mr. McNamara that was claimed in the '433 patent and whether Mr. McNamara, Mr. Cline, or others at Lancium were aware of certain information that Mr. Storms communicated to Mr. McNamara on the date(s) of such communications, (iii) Mr. Storms/Bearbox's simulation/system had the capabilities ascribed to it by Mr. Storms or Dr. McClellan, and (iv) Defendants converted any of Plaintiffs' technology and/or were unjustly enriched. For each issue/opinion, I include legal standards relevant to that issue/opinion below.

A. Legal Principles – Inventorship

23. Patents – Right to Exclude: Patents are granted by the United States Patent and Trademark Office (sometimes called the “PTO” or “USPTO”). A patent gives the owner the right to exclude others from making, using, offering to sell, or selling the claimed invention within the United States or importing it into the United States.

174. I have reviewed the entirety of the text communications between Mr. Storms and Mr. McNamara and do not consider the text communications to have provided any technology at all, let alone technology claimed in the '433 patent and/or that was allegedly converted (or utilized) by Lancium in any way. Also, I understand that Dr. McClellan did not opine that anything communicated in the text chain is claimed in the '433 patent, and/or was converted or utilized by Lancium.

[REDACTED]

²⁰² See BB00000090-97; LANCIUM00014645-652.

²⁰³ Storms Depo., at 71:24-92:9 (discussing his emails generally and in connection with communications with BuySellAds Todd Garland).

²⁰⁴ BB00000090; LANCIUM00014645; *see also* Storms Depo., at 217:6-12.

²¹² Storms Depo., at 149:13-151:6.

²¹⁷ Storms Depo., at 233:22-235:24; BB10000020-23.

²⁸⁵ *Id.* at 237:11-239:21; 145:16-146:19.

I declare under the penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 6th day of May, 2022, in College Station, Texas.

A handwritten signature in black ink, appearing to read 'M. Ehsani', written in a cursive style.

Mark Ehsani, Ph.D., P.E., LF. IEEE, F. SAE, M. AAAS

SHORT RESUME

M. Ehsani



M. Ehsani received the B.S. and M.S. degrees from the University of Texas at Austin in 1973 and 1974, respectively, and the Ph.D. degree from the University of Wisconsin-Madison in 1981, all in electrical engineering.

From 1974 to 1977 he was with the Fusion Research Center, University of Texas, as a Research Engineer. From 1977 to 1981 he was with Argonne National Laboratory, Argonne, Illinois, as a Resident Research Associate, while simultaneously doing the doctoral work at the University of Wisconsin-Madison in energy systems and control systems. Since 1981 he has been at Texas A&M University, College Station, Texas where he is now a Professor of electrical engineering and Director of Advanced Vehicle Systems Research Program and the Power Electronics and Motor Drives Laboratory. He is the author of over 400 publications in pulsed-power supplies, high-voltage engineering, power electronics, motor drives, and advanced vehicle systems and is the recipient of the Prize Paper Awards in Static Power Converters and motor drives at the IEEE-Industry Applications Society 1985, 1987, and 1992 Annual Meetings, as well as over 140 other honors and recognitions. In 1984 he was named the Outstanding Young Engineer of the Year by the Brazos chapter of Texas Society of Professional Engineers. In 1992, he was named the Halliburton Professor in the College of Engineering at A&M. In 1994, he was also named the Dresser Industries Professor in the same college. In 2001 he was selected for Ruth & William Neely/ Dow Chemical Faculty Fellow of the College of Engineering for 2001-2002, for "contributions to the Engineering Program at Texas A&M, including classroom instruction, scholarly activities, and professional service". In 2003 he was selected for BP Amoco Faculty Award for Teaching Excellence in the College of Engineering. He was also selected for the IEEE Vehicular Society 2001 Avant Garde Award for "Contributions to the theory and design of hybrid electric vehicles". In 2003 he was selected for IEEE Undergraduate Teaching Award "For outstanding contributions to advanced curriculum development and teaching of power electronics and drives." In 2004 he was elected to the Robert M. Kennedy endowed Chair in Electrical Engineering at Texas A&M University. In 2005 he was elected as the Fellow of Society of Automotive Engineers (SAE). He is the co-author of 20 books on power electronics, motor drives and advanced vehicle systems, including Vehicular Electric Power Systems, Marcel Dekker, Inc. 2003 and "Modern Electric Hybrid Vehicles and Fuel Cell Vehicles – Fundamentals, Theory, and Design", CRC Press, 2004. He is also the co-author of over 400 publications and has over 30 granted or pending US and EC patents. He has also been consultant to over 60 companies, US government agencies and international organizations. His current research work is in energy systems, power electronics, motor drives, hybrid vehicles and their control systems, and sustainable energy engineering.

Dr. Ehsani has been a member of IEEE Power Electronics Society (PELS) AdCom, past Chairman of PELS Educational Affairs Committee, past Chairman of IEEE-IAS Industrial Power Converter Committee and past chairman of the IEEE Myron Zucker Student-Faculty Grant program. He was the General Chair of IEEE Power Electronics Specialist Conference for 1990. He is the founder of IEEE Power and Propulsion Conference, the founding chairman of the IEEE VTS Vehicle Power and Propulsion and chairman of Convergence Fellowship Committees. In 2002 he was elected to the Board of Governors of VTS. He has also served on the editorial board of several technical journals and was the associate editor of IEEE Transactions on Industrial Electronics and IEEE Transactions on Vehicular Technology. He is a Life Fellow of IEEE, a past IEEE Industrial Electronics Society and Vehicular Technology Society Distinguished Speaker, IEEE Industry Applications Society and Power Engineering Society Distinguished Lecturer. He is also a registered professional engineer in the State of Texas.

3. Professor, Electrical Engineering, Texas A&M University, 1992-present
4. Director, Texas Applied Power Electronics Center, Department of Electrical Engineering, Texas A&M University, 1982-present
5. Director of Advanced Vehicle Systems Research Program, College of Engineering, Texas A&M University, 1992-present

□ **Industrial**

1. Research Engineer, Fusion Research Center, Austin, Texas, 1974-1977
2. Research Engineer, Argonne National Laboratory, 1977-1981
3. Consultant to over 65 U.S. and International Companies and Government Agencies

PROFESSIONAL SOCIETY MEMBERSHIPS

1. Institute of Electrical and Electronics Engineers (IEEE), since 1970
2. IEEE Industry Applications Society (IAS)
3. IEEE Industrial Electronics Society (IES)
4. IEEE Power Electronics Society (PELS)
5. IEEE Vehicular Technology Society (VTS)
6. Society of Automotive Engineers (SAE)
7. Member, American Energy Society
8. Registered Professional Engineer, Texas No. 57178

HONORS/AWARDS

1. Life Fellow of IEEE
2. Fellow of SAE
2. Outstanding Young Engineer of the year, 1984, Brazos Chapter, Texas Society of Professional Engineers.
3. Prize Paper First Place Award in Power Electronics, IEEE Industry Applications Society, 1985 and 1987 Annual Meetings.
4. Engineering Excellence Award (\$24,000), College of Engineering, Texas A&M University, 1986 and 1987.
5. Chief Editor for Power Systems Series, CRC Press, 1989.
6. General Chair, IEEE-PELS Power Electronics Specialists Conference, 1990.
7. Member of Editorial Board of Electric Machines and Power Systems Journal.
8. IEEE-Industrial Electronics Society Distinguished Speaker.
9. Plenary Session Author in IEEE Power Electronics Specialists Conference for 1990 and 1991.
10. Invited Author at IEEE Applied Power Electronics Conference and Exposition, Boston, February 1992.

11. Invited Author at 1992 International Symposium on Power Electronics, Seoul, Korea, April 1992.
12. Invited Author at International Aegean Conference on Electrical Machines and Power Electronics, Kusadasi, Turkey, May 1992.
13. Prize Paper Third Place Award in Motor Drives, IEEE Industry Applications Society 1992 Annual Meeting.
14. Invited Author and Panelist at 2nd International Power Electronics Congress, Cuernavaca, Mexico, August 1993.
15. IEEE Industry Applications Society Distinguished Speaker and Invited Author at II Brazilian Power Electronics Conference, Umuarama, Brazil, December 1993.
16. Plenary Session Author in IEEE Power Electronics Specialists Conference for 1993.
17. Winner of IEEE IAS 1993 Annual Meeting Prize Paper Award from the Motor Drives Committee.
18. Invited Author at Southcon Technical Conference, Orlando Florida, March 1994.
19. Member of the Scientific Committee of the 1st International Power Electronics and Motion Control Conference, Beijing, China, June 1994.
20. Invited Author in 1st International Power Electronics and Motion Control Conference, Beijing, China, June 1994.
21. Member of the Advisory Committee of Second International Workshop on “The Future of Electronic Power Processing and Conversion,” Berg-en-dal, South Africa, August 1994.
22. General Chairman of 3rd International Power Electronics Congress, Puebla, Mexico, August 1994.
23. Listed in Who’s Who in America, 49th through current Editions.
24. Listed in American Men and Women of Science.
25. Listed in Who is Who in the South and Southwest.
26. Invited Short Course in Tel Aviv University, Israel, May 1995.
27. Invited Paper in International Aegean Conference on Electrical Machines and Power Electronics, Kusadasi, Turkey, June 1995.
28. Member of Steering Committee, World Congress of Industry Leaders and Educators, Fair of Engineering Innovations and UNESCO-UNISPAR Seminar, sponsored by Jozef Zych, Speaker of Polish Parliament, October 1996.
29. Invited Short Course on “Sensorless variable reluctance machines,” IEEE Industry Applications society 1996 Annual Meetings, October 1996.
30. Member of Steering Committee of the 1st International Congress in Israel on Energy, Power & Motion Control, Tel-Aviv, Israel, November 1996.

31. Honorary Professor of Electrical Engineering, The University of Hong Kong, 1996.
32. Blue Ribbon University Lecture at US Department of Transportation, Research and Special Programs Administration, "Electrically Peaking Hybrid (ELPH) Vehicles: A Sustainable Technology for the 21st Century," Washington, DC, April 25, 1997.
33. Mahdavi, A. Emadi, M. D. Bellar and M. Ehsani, "Analysis of Power Electronic Converters Using the Generalized State Space Averaging Approach," Invited Paper for Special Issue of IEEE Transactions on Circuits and Systems on Simulation, Theory and Design of Switched Analog Networks, IEEE Trans. on Circuits and Systems, vol. 44, no. 8, August 1997.
34. Invited Paper on "Soft Switching Motor Drive Inverters for Electric and Hybrid Vehicles," in IEEE Industrial Electronics Annual Meeting, IECON'97, New Orleans, Louisiana, November 1997.
35. Invited Panelist on "Trends in Power Electronics and Motor Drives," Invited Paper in IEEE Industrial Electronics Annual Meeting, IECON'97, New Orleans, Louisiana, November 1997.
36. Elected IEEE Industry Applications Society Distinguished Lecturer, 1998-99.
37. Invited Lecture, entitled "Modern Motor Drives for Industrial and Product Applications," IEEE Chapter Meeting, Little Rock Arkansas, January 22, 1998.
38. National Science Foundation Site Reviewer for NSF Center Proposal, Blacksburg, Virginia, Jan. 19-22, 1998.
39. Invited Speaker, IEEE Power Engineering Society Section Meeting, Columbus, Ohio, March 31, 1998.
40. Key Note Speaker, Southeast Michigan Section Spring Meeting, April 2, 1998, Dearborn, Michigan.
41. Invited Key Note Speaker on "State of The Art in Power Electronics and Motor Drives," Vicenza Trade Fair and Workshop, Vicenza, Italy, May 15, 1998.
42. Invited Seminar at Toshiba Small Motor Development Center, "Advanced Switched Reluctance Motor Drives for Industrial and Traction Applications," July 14, 1998.
43. M. Ehsani, R. Velayutham, S. Gopalakrishnan, and B. Fahimi, "Sensorless Control of Switched Reluctance Motor: a Technology Ready for Applications," Invited Paper, International Conference on Electrical Machines, Istanbul, Turkey, September 2-4, 1998.
44. Member of Program Committee, International Conference on Electronics, October 1998, Oran, Algeria.
45. Invited Paper, entitled "Switched Reluctance Motor Drives: State of the Art and Applications," 1998 Special Issue of Indian Academy of Sciences.
46. Member International Steering Committee, The IEEE International Symposium on Diagnostics for Electrical Machines, Power Electronics and Drives, Gijon, Spain, September, 1999.
47. Organizer and Plenary Paper Presenter for Invited Session at 1999 International Federation of Automatic Control (IFAC) World Congress in Beijing, China: Advances in Real-Time DSP Control of Stiff Systems.

48. Organizer Presenter for Tutorial Session at 1999 American Control Conference (ACC) in San Diego, California: Advances in Real-Time Control of Motor Drive Systems.
49. Listed in Dictionary of International Biography, Cambridge, England, 27th Edition, 1999.
50. Member of International Steering Committee of IEEE International Power Electronics Congress, Acapulco, Mexico, 2000.
51. Member of Technical Program Committee of Forth International Power Electronics Conference (IPEC-Tokyo 2000).
52. Member of Technical Program Committee of 3rd International Power Electronics and Motion Control Conference (IPEMC, 2000).
53. Appointed as the Distinguished Lecturer of IEEE Power Engineering Society, 1999-2000.
54. Member of International Steering Committee of the 1999 IEEE International Symposium on Diagnostics for Electrical Machines, Power Electronics and Drives, September 1-3, Spain.
55. Invited Seminar to the Local Chapter of IEEE in Istanbul, Turkey on “State of the Art in Power Electronics and Motor Drives,” August 27, 1998.
56. Invited Seminar to the Local Chapter of IEEE in Paris, France on “An Over View and State of the Art in Hybrid Electric Vehicles,” September 23, 1999.
57. Invited Seminar to the Local Chapter of IEEE in Heidelberg, Germany on “State of the Art and Recent Applications of Switched Reluctance Motor Drives,” November 19, 1999.
58. Invited Seminar at the Swiss Federal Institute of Technology on “State of the Art on Sensorless Switched Reluctance Motors,” Zurich, Switzerland, May 9, 2000.
59. Invited Short Course at Tel Aviv University on “Hybrid Electric Vehicles,” Tel Aviv, Israel, May 23-25, 2000.
60. Invited Seminar at Technion University on “State of the Art on Electric and Hybrid Vehicles,” Haifa, Israel, May 29, 2000.
61. Invited Presentation in First Sned Research Institute Workshop on Fuel Cell Hybrid Track Vehicles, August 1-3, 2000, Georgetown, Texas.
62. Advisor to the Board of Directors of Sned Research Institute.
63. Listed in International Who’s Who of Professionals, 2001.
64. Member of International Steering Committee of VII IEEE Power Electronics Congress, Acapulco, Mexico, October 2000.
65. Reference Publications Listed in Infography Publishers’ Fields Of Knowledge.com, in Switched Reluctance Motor Drives, Solid State Power Systems, Brushless DC Motor Drives, Hybrid Electric Vehicles, and Synchronous Reluctance Motor Drives.

EXHIBIT B

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE

BEARBOX, LLC; and AUSTIN)
STORMS,)
)
Plaintiffs,)
)
vs.) No. 21-534-MN-CJB
)
LANCIUM, LLC; MICHAEL T.)
McNAMARA; and RAYMOND E. CLINE,)
JR.,)
)
Defendants.)

The Videotaped Videoconference Deposition
of MARK EHSANI, Ph.D., called by the Plaintiff for
examination pursuant to notice and pursuant to the
Rules of Civil Procedure for the United States
District Courts pertaining to the taking of
depositions, taken before Steven Stefanik, a notary
public within and for the County of DuPage and
State of Illinois, on the 6th day of June 2022.

1 Q. But, Dr. Ehsani, are you offering an
2 opinion as to what Mr. Storms considered to be
3 confidential or not?

4 A. No, I'm offering an opinion about what
5 confidential information and the protocol or
6 nondisclosure agreement is understood in the field
7 by person of ordinary skill, by responsible people
8 and by people that consider themselves having
9 confidential technology.

10 Q. Okay. And the basis for that opinion is
11 what you just said, your experience in the field
12 and your knowledge of a person of ordinary skill in
13 the art?

14 A. Among other things, but I have practiced
15 that. I have seen numerous companies large and
16 small practice that. They always sign an NDA
17 before they give me information, and they refuse to
18 listen to my technology if they think that it may
19 violate some technology that they are working on.

20 These things are well-established and
21 extremely professionally and carefully handled by
22 people who make a living doing this kinds (sic) of
23 stuff.

24 Q. In your opinion, Dr. Ehsani, is it not

1 Dallas, Texas, appeared as attorney for the
2 defendant.

3 I further certify that I am not a relative
4 or employee or attorney or counsel of any of the
5 parties, or a relative or employee of such attorney
6 or counsel, or financially interested directly or
7 indirectly in this action.

8 In witness whereof, I have hereunto set my
9 hand and affixed my seal of office, at Chicago,
10 Illinois, this 6th day of June 2022.

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Steven T. Stefanik, CSR

No. 084-003298